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February 25, 2012

VIA ELECRONIC FILING

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, S.W., Suite TW-A325 Washington, D.C. 20554

> Annual 47 C.F.R. § 64.2009(e) CPNI Certification RE:

> > Covering Calendar Year 2011

EB Docket No. 06-36 Comtran Associates Inc. FRN 0003509106

Dear Ms. Dortch:

Comtran Associates Inc. by its attorneys and pursuant to Section 64.2009(e) of the Commission's rules, hereby submits the attached letter in response to DA 12-170 regarding the FCC's annual CPNI Certification.

If there are any questions regarding this submission, please contact Elizabeth R. Sachs at 703-584-8663 or lsachs@fcclaw.com, or the undersigned.

Very truly yours,

Tamara Davis Brown

Enclosures

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VIA ELECTRONIC FILING

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, D.C. 20554

Re:

47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36 Comtran Associates FRN 0003509106

Dear Ms. Dortch:

Comtran Associates (the "Company") hereby files this letter in lieu of the CPNI certification statement. The FCC previously determined in a December 2010 Order that licensees with non-interconnected, dispatch-only operations were not obligated to make a CPNI filing, and cancelled the related forfeiture issued for failure to make such a filing. The Company operates a non-interconnected, dispatch-only system identical to those licenses in the December Order. Accordingly, the Company believes it is not required to make an annual CPNI filing.

Please note that the Company will not make any future CPNI-related filings unless the Company modifies its offering to include interconnected service or unless the Company is directed to file by the FCC. Should the Commission have any questions, please contact the undersigned.

Leonard Knigin

President

February 27, 2012